

WILLIAM GRANT & SONS Privacy Policy

Document details

This is the privacy policy of William Grant & Sons (William Grant & Sons Brands Ltd.). The company is registered at the address: plant Scotland, The Glenfiddich Distillery, Dufftown, Banffshire, AB55 4DH. Terms “our”, “us”, “we”, or “Company” hereinafter in this policy mean William Grant & Sons Limited, its subsidiaries, affiliates and partners.

We own and control websites wgsacademy.com, www.wgrant.com, www.williamgrantusa.com and www.wgskorea.co.kr

We shall protect your personal data; your confidentiality is important to us. This Personal Data Processing Policy has been prepared to explain to you how we collect, use, transfer and store your personal data when you use this website and inform you about the things we do with this information. These data include any information that you provide to us while using the website and/or registering for further communication and participation in events.

It is important for you to find time to read and review the document and the terms and conditions of our website. This will help you understand how we use your data.

If you do not agree with any provision of the policy, please do not use the website and do not send any personal data to or via it.

Types of personal data we collect

We can collect, use and store different types of your data:

Data type	Description
Identification data	Your name and surname, age
Contact details	Including but not limited to postal code, email address and telephone numbers.
Technical data	Information obtained from you when you visit the website, including but not limited to IP-address, browser type and version, location and time zone, browser plug-ins type and version, operating system and platform, and other data from the devices that you use to access the website.
Financial data	Details of your bank account and bank card
Transactional data	Payment details and other information about products and services that you buy from us.
Contractual data	Details of services that we provide you with
Social and age data	Details of your job or profession, nationality, education and your status in different social and income groups.
Usage data	Information about how you use our website, products and services
Marketing and communicational data	Information about marketing information that you prefer receiving from us and your preferred means of communication

How do we use your personal data

We collect and use your personal data for the following purposes:

1. To provide our services and fulfill our legal obligations.
2. To identity authentication, if required.
3. To get in touch with you via email or telephone.
4. To understand your needs and means of satisfying them.
5. To make records.
6. To process financial transactions.
7. To offer you to visit events.

8. To offer you relevant materials and information about events, projects and products.

For instance, in the table below we explain how we use your data and the reasons we rely on while doing it. If such reasons include legal requirements, we explain them.

Why do we use your data	Our reasons	Our legal interests
<ul style="list-style-type: none"> To provide our services. To provide and control payments. 	<ul style="list-style-type: none"> Contract execution Legal interests Legal obligations 	<ul style="list-style-type: none"> Effective execution of legal and contractual obligations Compliance with applicable regulations
<ul style="list-style-type: none"> To control our relationship with you, which may include a request for submitting feedback or completing a survey or informing you about changes in our terms and conditions or confidential policy. 	<ul style="list-style-type: none"> Contract execution Legal obligations Legal interests 	<ul style="list-style-type: none"> Update our records and study the ways our customers use our products / services
<ul style="list-style-type: none"> For you to take part in a giveaway, a competition or complete a survey (if applicable) 	<ul style="list-style-type: none"> Contract execution Legal interests 	<ul style="list-style-type: none"> Possibility to study the ways our customers use our products / services, develop such products / services and develop our business
<ul style="list-style-type: none"> To provide you with relevant content on websites and to evaluate or understand the effectiveness of advertisement we serve 	<ul style="list-style-type: none"> Legal interests 	<ul style="list-style-type: none"> To study how our customers use our products / services, to develop our business and improve our marketing strategy
<ul style="list-style-type: none"> To use data analytics to improve our website, products / services, marketing, relationships with clients, and experience 	<ul style="list-style-type: none"> Legal interests 	<ul style="list-style-type: none"> Determination of customer types for our products and services, to keep our website up-to-date, to develop our business and to inform you about our marketing strategy
<ul style="list-style-type: none"> For effective and correct business operation. It includes control of our financial status, business opportunities, planning, communications, corporate management and audit. 	<ul style="list-style-type: none"> Legal interests Legal obligations 	<ul style="list-style-type: none"> To be effective in how we execute our legal obligations Following applicable regulations
<ul style="list-style-type: none"> To exercise our rights stated in contracts or agreements 	<ul style="list-style-type: none"> Contract execution 	
<ul style="list-style-type: none"> To make product or service offers on our websites to attract you 	<ul style="list-style-type: none"> Legal interests 	<ul style="list-style-type: none"> Development of our products / services and the possibility to develop our business

We process data in any legal way, including collection, recording, classification, accumulation, storage, specification (updating, amendment), extraction, use, blocking, deleting, destruction of data.

From where we collect your personal data

We are entitled to collect personal data about you (or your company) from the following sources:

- Technical data, including your IP-address, browser type and version, settings and time zone location, browser plug-ins type and version, operating system and platform, and other information from the devices which you use to access the website;

- Data that we collect when you register on our websites;
- Data that we collect when you use our services, e.g. information about payments and transactions, identity and contact details;
- Data from the third parties we work with (e.g. common access resources, partner companies, etc.).

Information that you publish on common access parts of our website or social networks

Information that you publish on any common access parts of the website (for example, on chats, notice boards or discussion forums) or any pages of social network that we operate, shall be common access information. It means that it can be collected by the third parties or used by them to send you undesired messages. We do not control how other users use such information, so you have to be careful and not disclose personal data while using common access websites or social networks. We are not responsible for any messages with personal data that you send.

With whom we share data

We are entitled to transfer your personal data to the third parties, including the following: limited liability company Serviceplan Group Rus (PSRN 1127746384677 / TIN 7721758178), limited liability company Louder Active (PSRN 1117746170574 / TIN 7725717623), limited liability company Louder SPX (PSRN 1177746452410 / TIN 7704410616), limited liability company Serviceplan Russia (PSRN 1087746629112 / TIN 7703666044), limited liability company PlanNet (PSRN 1177746947267 / IHH 7704444164), and persons participating in our marketing projects.

Data security

We have taken corresponding safety measures to prevent accidental loss, use or unauthorized access to, amendment or disclosure of your personal data. Also, we limit the access to your personal data to employees, agents, contractors and other third parties. They shall process your personal data only according to our instructions and shall respect confidentiality.

We have implemented procedures to fight any alleged leakage of personal data and we shall inform you and any applicable authority about any violation if we shall do it according to the law.

Marketing

We want to give you a choice in relation to using particular personal data, including in marketing.

We shall receive your consent to participate before sending you direct messages or sharing your personal data with any third party for marketing purposes.

You can ask us or the third parties to stop sending you messages at any time by contacting us.

If you refuse to receive the messages, the refusal shall not cover personal data provided to us during the execution of services.

How we use your data for automated decisions

While providing our services, we sometimes use automated decision systems that are based on personal data that we have or collect from others about you and / or your company. This helps us to provide the highest possible effectiveness.

We use the following automated decisions:

- 1) Mailchimp – a platform for automation of our working processes and emailing service,
- 2) Mandrill – communication service for setting emails,
- 3) API data processing (parts of our websites' servers for entering data to the abovementioned services).

If you decide not to give us your personal data, this may prevent you from receiving our services.

For how long we store your personal data

We shall store your personal data until it is required for the purposes stated by this policy, including the purpose of executing any legal obligations, accounting or recording obligations that we may have. We shall store personal data for longer periods only if it is required according to the law.

To determine for how long we can store your data, we shall examine the number, type and confidentiality of affected personal data and potential risk of damage if it is lost, used or disclosed without proper authorization. Also, we review the goals for which we process your personal data and whether we can achieve such goals by other means without storing your data.

In some cases, you may ask us to delete your data (see more details in chapter Your Rights below).

In some cases, we may make your personal data impersonal so that the data can no longer be connected to you, for example for statistical purposes. When we do so, we can use the data for an unlimited period without additional notification.

How do we store your personal data globally

[Note: if data is stored globally, describe where it is stored and how it is protected]

Other data that we collect

We collect and process the following data from our website:

- Details of visits to our website, including traffic data, location, weblogs and other means of communication, whether or not it is required for our personal purposes of issuing invoices or in any other way, or resources that you get access to;
- IP-addresses – we automatically receive your ID-address when you visit the website;
- Cookies – we use cookies according to our Cookies Policy that you set up in your browser for not accepting it. If you switch off or decline cookies, please note that some parts of the website may become unavailable or work incorrectly.

If this website contains links to other websites, William Grant & Sons shall not be responsible for the confidentiality policy and actions of the third parties. Clicking these links or switching on such linkups may lead to the third parties collecting or transferring your data. We do not control third-party websites and shall not be responsible for their confidentiality claims. When you leave our website, we recommend you to read the confidentiality policy of each website you visit.

Your rights

Access to your data – you are entitled to request a copy of your personal data that we store.

Correct your data – we want to be sure that your personal data is correct, full and up-to-date, and you may ask us to correct any personal information about you which, in your opinion, does not correspond to this standard.

Delete your data – you are entitled to ask us to delete your personal data if:

- You think that we no longer need the data for the purposes it was collected
- We use the data upon your consent and you withdraw your consent – see Data Use Consent Withdrawal below
- You reasonably objected against us using your personal data – see Objection Against How We May Use Your Data below
- Us using your personal data violates the law or other legal obligations

Objection against using your data on specific means of communication – you are entitled at any time to demand from us to stop using your personal data for marketing purposes. Also, when we use your personal data for purposes of public interest or according to legal interests of us or a third party, then, if you ask us, we will stop using your personal data, unless there will be no prevailing legal reasoning for continuing.

Limit the use of your data – in some cases, you may ask us to limit the use of your personal data. This right may apply when, for example, we check the accurateness of your personal data that we store or evaluate

reasons for any objection that you claim against us using your data. The right may also apply if it is no longer a reason for the use of your personal data but you do not want us to delete your data. When this right is executed legally, we may use corresponding personal data only upon your consent, for legal claims or in case of any other public interest.

Transferability – if we process personal data that you provide us according to this consent or if it is required to execute the contract where you are one of the parts and the processing is provided via automated means, you have a right to transfer such personal data in a machine-readable format. If it is not possible technically, you are also entitled to get this personal data transferred directly to another controller.

Automated processing – if we use your personal data automatically for making legally meaningful decisions that significantly affect you, you are entitled to ask to review the case by a person to whom you may make statements and challenge decisions. This right applies only when we use your data upon your consent or within contractual relationships with you.

Your data use consent withdrawal – if we use your personal data upon your consent, you may withdraw this consent at any time and we will stop using your personal data for the purposes the consent was given to.

Please contact us via email: info@wgsacademy.com if you want to exercise any of these rights.

Amendment of confidentiality policy

We regularly review this policy and publish all amendments on the website. We recommend you regularly check this page to make sure to be familiar with the latest edition.

This confidentiality policy was last updated on October 07, 2020.